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September 27, 2023

VIA ECF

The Honorable Andrew L. Carter, Jr.
 United States District Court
 Southern District of New York
 40 Foley Square
 New York, NY 10007

USDC SDNY
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Re: *Pierre v. City of New York, et al.*, No. 1:20-cv-05116-ALC-VF

Dear Judge Carter:

We represent Plaintiffs in the above-referenced action and write jointly with Defendant TD Bank N.A. to respectfully request an approximate one (1) month extension of the deadlines set forth in the Court's Preliminary Approval Order dated September 22, 2023. *See* ECF No. 399.

The parties are working diligently and cooperatively to obtain updated contact information for class members in order to issue Settlement Notices. The parties need more time to obtain information about certain individuals from the City of New York. Also, once this information is provided to the Settlement Administrator, due to the sheer volume of class members – approximately 5,500 – the Administrator needs additional time to conduct its verification protocols, secure requisite approvals, and physically prepare the notices for mailing to the class.

As such, the parties respectfully request that the deadlines set forth in the preliminary Approval Order be extended by approximately one (1) month. More specifically, the parties request that the deadline to file final approval papers be extended from January 12, 2024 to **February 19, 2024** and that the Fairness Hearing be adjourned from January 24, 2024 at 11am to **March 4, 2024 at 11am** or for any date and time thereafter that is convenient for the Court.


This is the parties' first request for an extension of these deadlines. We thank the Court for its time and attention to this matter.

Respectfully submitted,

Innessa M. Huot

cc: Counsel of Record (via ECF)

The parties' request is **GRANTED**. The final approval papers are due **February 19, 2024**. The final fairness hearing currently scheduled for January 24, 2024 is hereby **ADJOURNED** until **March 4, 2024 at 11am Eastern Time**. All Parties shall appear and should contact the Court at **1-888-363-4749 (access code: 3768660)**.

SO ORDERED:


HON. ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE

Dated: October 2, 2023